REMARKS

The office action of August 4, 2008 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 17-30 remain in this application. Claims 17 and 25 have been amended to be in a more preferred form. Claims 1-16 and 31-32 have been canceled without disclaimer or prejudice. Applicants request reconsideration of the August 4, 2008, office action based on the following comments.

Rejections under 35 U.S.C. § 112

Claims 17 and 25 stand rejected under 35 U.S.C. § 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. More particularly, "database monitor" as recited in claim 17 is alleged vague and varied making the language indefinite.

As suggested by the Examiner, Applicants have amended claims 17 and 25 to place the claims in a more preferred form. As such, Applicants respectfully request that this rejection be withdrawn.

Arguments Raised in Applicants' Response of March 11, 2005

In response to the Examiner's December 15, 2004, office action, Applicants raised a number of arguments of why the claims are patentable over the applied references via Applicants' response of March 11, 2005. Applicants' representative raised the same issues during a telephone interview of March 10, 2005, with the Examiner.

Applicants submit that the office action of August 4, 2008 repeats the same grounds of rejection for claims 17-26 as previously made in the office action of December 15, 2004. Notably, the Examiner has not yet addressed Applicants' arguments against the rejection. Applicants specifically request the Examiner respond to each argument raised below.

Rejections under 35 U.S.C. § 103

Rejections of Claims 17-26

Claims 17-26 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 7,563,999 to Yaksich et al. ("Yaksich") in view of U.S. Patent No. 6,330,542 to Sevcik et al. ("Sevcik"). Applicants respectfully traverse.

The rejections to claims 17-26 have been previously made and responded to. The representative for the Applicants noted in the Response and Reconsideration of March 11, 2005 that the rejections made in the Office Action mailed December 15, 2004 were substantially identical to those made in the Office Action mailed January 20, 2004. It appears that with respect to claims 17-26, the same rejections that were made in the Office Action of December 15, 2004 and January 20, 2004 are made yet again in the Office Action mailed August 4, 2008. Notably, these rejections were first substantively addressed in a Request for Reconsideration dated July 20, 2004. In response, the next office action, dated August 24, 2004 acknowledged the Request for Consideration and withdrew the rejections.

Claim 17 recites, *inter alia*,

> "a print processing facility, located at a geographic location different from the corporate location and coupled to the database monitoring unit over a network, wherein the print processing facility receives the event data, compares the event data to one or more predefined event rules that determine whether the printed product should be produced and, in response to a positive determination, automatically generates a print order for the printed product using information extracted from the event data."

The Action concedes that Yaksich fails to teach or suggest such a feature, but instead relies on Sevcik. Office Action, pp. 3-4. Applicants respectfully submit that Sevcik fails to overcome this deficiency of Yaksich. At best, Sevcik discloses a method and system for automatically generating quotes for commercial printing pursuant to particular needs controlled and specified by the buyer. Col. 1, ll. 10-15. The Office Action cites several passages from Sevcik which describe the selection and processing of variable options in generating an automated quote for the potential buyer. Office Action, p. 4. However, such a method does not teach or suggest that the printing processing facility "compares the event data to one or more

predefined event rules that determine whether the printed product should be produced..." as recited in claim 17. Indeed, Sevcik discloses that the decision of whether or not a printed product should be produced is ultimately made by the buyer. Col. 13, ll. 27-34. As such, Sevcik specifically teaches away from said feature of claim 17. Thus, the combination of Yaksich and Sevcik would not have resulted in the claim 17 for at least this reason.

Moreover, Sevcik does not teach or suggest the claim 17 feature of "in response to a positive determination, automatically generates a print order for the printed product using information extracted from the event data." More particularly, since Sevcik does not teach making a positive determination of whether a printed product should be produced according to predefined event rules, it necessarily follows that Sevcik neither teaches nor suggests "*in response to a positive determination*, automatically generates a print order for the printed product..." as called for in claim 17. (emphasis added). At best, Sevcik discloses executing a job according to quote parameters upon receiving an order command from the buyer. Col. 13, ll. 27-59. Therefore, claim 17 is allowable for this additional reason.

Applicants respectfully submit that even assuming but not conceding proper, a combination of Yaksich and Sevcik fails to result in each and every feature of claim 17 for at least the reasons set forth above and in the Request for Reconsideration dated July 20, 2004. Therefore, claim 17 is allowable.

Moreover, claims 18-26 depend ultimately from claim 17, and are allowable for at least the same reasons as claim 17 and in further view of the advantageous features recited therein.

Rejections of Claims 27-30

Claims 27-30 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Yaksich in view of Sevcik and further in view of IPrint.com. Applicants respectfully traverse.

Claims 27-30 ultimately depend on claim 17. With respect to claim 17, IPrint.com fails to cure the deficiencies of Sevcik and Yaksich. More particularly, IPrint.com fails to teach or suggest the claim 17 feature of:

> "a print processing facility, located at a geographic location different from the corporate location and coupled to the database monitoring unit over a network, wherein the print processing facility receives the event data, compares the event data to one or

more predefined event rules that determine whether the printed product should be produced and, in response to a positive determination, automatically generates a print order for the printed product using information extracted from the event data."

As such, even assuming but not conceding that a combination of Yaksich, Sevcik and IPrint.com is proper, such a combination fails to result in the teaching or suggesting each and every feature of claim 17. Therefore, claims 27-30 are allowable at least based on their dependence on claim 17, and in further view of the advantageous features recited therein.

If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,
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